

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DAVID J. CATANZARO,	:	Civil Case No. 3:22-CV-01754-
	:	JFS-DFB
Plaintiff	:	(Judge Joseph F. Saporito Jr.)
	:	(Referred to Judge Phillip J.
v.	:	Caraballo)
	:	
LYKART TECHNOLOGIES LLC,	:	
ET AL.,	:	
	:	
Defendants.	:	
	:	

**MOTION TO DISMISS**

Defendants Apple Inc., Google LLC, YouTube, LLC, and Mozilla Corporation, (collectively “Moving Defendants”) hereby move to dismiss the Fifth Amended Complaint filed by plaintiff David J. Catanzaro (Dkt. 71) under Federal Rules of Civil Procedure 12(b)(1), 12(b)(3) and 12(b)(6).

This motion is based on this Notice, the concurrently filed Brief in Support of the Motion, all matters of record filed with the Court in this case, any argument at hearing of this matter, and such other materials the Court may consider.

Under Local Rule 7.1, the undersigned sought concurrence from Plaintiff, and Plaintiff did not provide concurrence to the relief sought herein.

Date: June 13, 2025

Respectfully submitted,

s/ Stephen H. Barrett

Stephen H. Barrett

DLA PIPER LLP (US)

s/ John V. Gorman

John V. Gorman (PA ID 80631)

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*Counsel for Defendants Google LLC  
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**CERTIFICATE OF SERVICE**

I hereby certify that this 13th day of June 2025, a copy of the foregoing Motion to Dismiss was served on all counsel of record by ECF and served on plaintiff by email.

s/ John V. Gorman

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John V. Gorman